

1 **DAVID M. MICHAEL, CSBN 74031**
2 **MICHAEL & BURCH LLP**
3 **One Sansome Street, Suite 3500**
4 **San Francisco, CA 94104**
5 **Telephone: (415) 946-8996**
6 **Facsimile: (415) 946-8837**
7 **E-mail: david@michaelburchlaw.com**

8 **Attorney for Defendant**
9 **EVGENI KOPANKOV**

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 **UNITED STATES OF AMERICA, No. 19-CR-00178 VC**

13 **Plaintiff,**

14 **v.**

15 **EVGENI KOPANKOV,**

16 **Defendant.**

17 **DECLARATION OF COUNSEL IN**
18 **SUPPORT OF DEFENDANT'S MOTION**
19 **TO DISCHARGE RETAINED COUNSEL**
20 **RE: VALUATION OF VEHICLES.**

21 I, David Michael, declare as follows:

22 Although Mr.. Kopanko has moved that I be discharged as his counsel. District Judge
23 Chhabria has granted that motion subject to a showing of indigency. I am assisting Mr.
24 Kopankov in that proceeding.

25 At the hearing on August 10, 2022, before Magistrate Judge Sallie Kim, the Court
26 inquired regarding the present value of a number of new vehicles purchased in 2022 by Mr.
27 Kopankov under the car sharing program of Tora.com. Specifically, the Court inquired if the
28 vehicles might have a present value greater than the price that Mr. Kopankov actually contracted
for the purchase of the vehicles or the amounts he presently owed for the vehicles.

After some research, all experts in the field seem to universally agree that a new car's
value significantly decreases in the first year after sale. This court has asked for a confirmation
of that as to the six vehicles that Mr. Kopankov purchased under the car sharing program of
Toro.com. This research was done in two ways.

DECLARATION OF COUNSEL IN SUPPORT OF DEFENDANT'S MOTION TO DISCHARGE
RETAINED COUNSEL RE: VALLUATION OF VEHICLES.
CASE NO. 19-CR-00178 VC

1 First, the undisputed general opinion in the vehicle sale community confirms that a
 2 vehicle loses a significant value in the first year after purchase. See,
 3 <https://www.lendingtree.com/auto/how-much-do-new-cars-depreciate>. (“Cars lose the most value
 4 in the first year, and depreciation continues for about five years. A car can lose up to 20% of its
 5 value in the first year, and over the first five years fall to around 40% from the original price”).
 6 See, also, <https://trafficautodriving.com/how-much-does-new-car-depreciate-after-buying-it>.
 7 (“New cars depreciate faster than used cars, with the value of a new car typically dropping by
 8 over 20% after the first year ownership then continuing to depreciate by 10% or so each year
 9 after that. After five years, your car could be worth roughly half of what you initially paid for
 10 it.”).

11 Simply based on the above, there is no basis to believe that the vehicles purchased by Mr.
 12 Kopankov could possibly have a value greater than the amount for which he purchased the
 13 vehicles. That possibility would violate simple economics related to newly purchased vehicles.

14 In addition, and as to the specific vehicles owned by Mr. Kopankov under the car sharing
 15 program of Toro.com, those decreased values are also conformed by way of research through the
 16 official Kelly Blue Book website.¹ Those Kelly Blue Book valuations are attached hereto as

17 **Exhibit A:**

18 MERCEDES BENZ GLE 2022;
 19 Amount Owed \$71,000.
 20 Present Trade In Value: \$60,072 (9,000 miles)

21 FORD F150 2019
 22 Amount Owed: \$47,000
 23 Present Trade In Value: \$36,127 (66,000 miles)
 24 Note: Vehicle stolen and Lien Holder Notified

25 //
 26 //
 27

28 ¹ Kelly Blue Book (KBB), founded in 1926, is an Irvine, California-based vehicle valuation and
 automotive research company that is recognized by both consumers and the automotive industry. The
 company is owned by the Cox Automotive subsidiary of Cox Enterprises. [Wikipedia](https://en.wikipedia.org/wiki/Kelly_Blue_Book)

PORSCHE MACAN Sports Utility 2021

Amount Owed: \$54,000

Present Trade In Value: Information Unavailable

TOYOTA TUNDRA 2022

Amount Owed: \$88,084

Present Trade In Value: \$56,789 (2,000 miles)

VOLKSWAGEN ATLAS CROSS SPORT 2022

Amount Owed: \$67,091

Present Trade In Value: \$45,537 (6,000 miles)

POLARIS SLINGSHOT 2022

Amount Owed: \$37,000

Present Trade In Value: Unknown

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 16, 2022

s/David M. Michael

DAVID M. MICHAEL

Attorney for Defendant
EVGENI KOPANKOV

EXHIBIT A

12:01

5G 

2022 Volkswagen Atlas Cross Sport SEL Premium R-Line 4MOTION Sport Utility 4D

VIN: **1V2FE2CA2NC216898**

Mileage: **6,000**  [Edit Options](#)

3.9  (18 Ratings) [Write a review](#)



Recalls: **3 Recalls Found**

[Is my car affected?](#)



Repair Estimator: **See Pricing**

[What's a fair price?](#)



1 Compare Your Values

Use these values to help make a confident decision on whether to sell, trade or donate your car.

< Cash Offer **Trade-in** Private Sale >

Trade-in Range
\$43,895 - \$47,295
Trade-in Value
\$45,537

AA

kbb.com



12:03

5G



2022 Toyota Tundra Double Cab

Limited Pickup 4D 6 1/2 ft

VIN: 5TFJA5DA1NX009175

Mileage: **2,000**



[Edit Options](#)

4.0 ★ (6 Ratings) [Write a review](#)



Can You Save on Car Insurance?

[Compare rates on KBB.com](#)



Repair Estimator: **See Pricing**

[What's a fair price?](#)



1 Compare Your Values

Use these values to help make a confident decision on whether to sell, trade or donate your car.

< Cash Offer **Trade-in** Private Pa >

Trade-in Range
\$55,200 - \$58,507

Trade-in Value
\$56,789



Get a Cash Offer

🔒 kbb.com

12:04

📶 5G🔋

2021 Porsche Macan Sport Utility 4D

VIN: **WP1AA2A54MLB12911**

Mileage: **12,000** ✎ [Edit Options](#)

[Review this car](#)



Recalls: **1 Recall Found**
[Is my car affected?](#)



Repair Estimator: **See Pricing**
[What's a fair price?](#)



Compare Your Values

Use these values to help make a confident decision on whether to sell, trade or donate your car.



Cash Offer

Trade-in

Private Pa



Info Currently Unavailable

One or more data points are missing so
Kelley Blue Book cannot display this graphic.
Please check back soon.



🔒 kbb.com

12:10

5G📶 🔋

2018 Ford F150 Supercrew Cab

King Ranch Pickup 4D 6 1/2 ft

VIN: **1FTEW1EGXJFB44380**

Mileage: **66,000** ✎

[Edit Options](#)

[Review this car](#)



Recalls: **15 Recalls Found**

[Is my car affected?](#)



Repair Estimator: **See Pricing**





What's a fair price?



1 Compare Your Values

Use these values to help make a confident decision on whether to sell, trade or donate your car.

< Cash Offer **Trade-in** Private Sale >

Trade-in Range
\$32,124 - \$36,127
Trade-in Value

Get a Cash Offer

AA

kbb.com



12:12

5G



My Car's Value

2022 Mercedes-Benz GLE

GLE 350 4MATIC Sport Utility 4D

VIN: **4JGFB4KB3NA625113**

Mileage: **9,000**  [Edit Options](#)

[Review this car](#)



Can You Save on Car Insurance?

[Compare rates on KBB.com](#)



Repair Estimator: **See Pricing**

[What's a fair price?](#)



1 Compare Your Values

Use these values to help make a confident decision on whether to sell, trade or donate your car.



Cash Offer

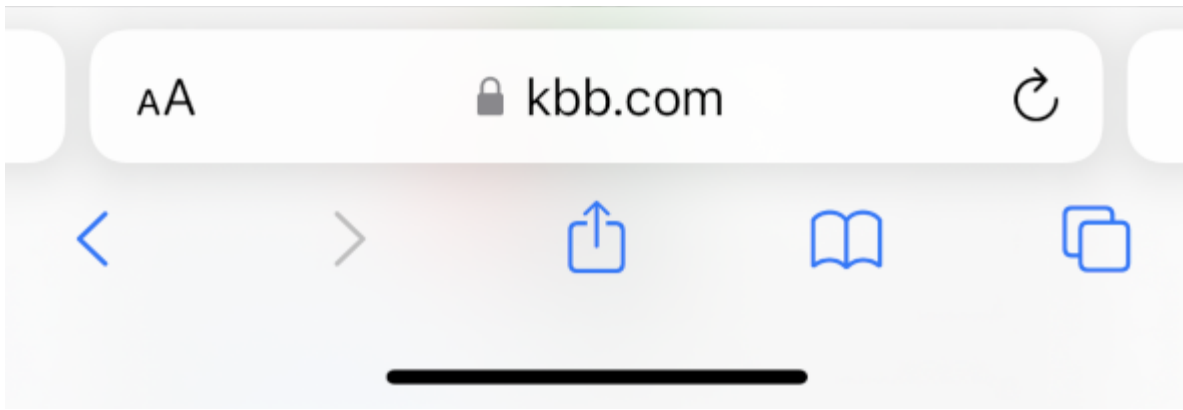
Trade-in

Private Pa



Trade-in Range
\$58,375 - \$62,020

Trade-in Value
\$60,072



CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that, on August 15, 2022, I caused to be electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing on all ECF-registered counsel by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/David M. Michael

DAVID M. MICHAEL

Attorney for Defendant
EVGENI KOPANKOV

